

1 RENE L. VALLADARES
2 Federal Public Defender
3 State Bar No. 11479
4 KATHRYN C. NEWMAN
5 Assistant Federal Public Defender
6 Nevada State Bar No. 13733
7 411 E. Bonneville, Ste. 250
8 Las Vegas, Nevada 89101
9 (702) 388-6577/Phone
10 (702) 388-6261/Fax
11 Kathryn_Newman@fd.org

12 Attorney for Joseph Holmes

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,

16 Case No. 2:20-mj-00902-DJA

17 Plaintiff,

18 v.
19 **SECOND STIPULATION TO
20 MODIFY CONDITIONS OF
PRETRIAL RELEASE FOR TRAVEL**

21 JOSEPH HOLMES,

22 Defendant.

23 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
24 Trutanich, United States Attorney, and Jim W. Fang, Assistant United States Attorney, counsel
25 for the United States of America, and Rene L. Valladares, Federal Public Defender, and Kathryn
26 C. Newman, Assistant Federal Public Defender, counsel for Joseph Holmes,

27 This Stipulation is entered into for the following reasons:

28 1. Defendant Joseph Holmes made his initial appearance in this proceeding on
29 November 9, 2020, before U.S. Magistrate Judge Cam Ferenbach. ECF No. 15. Magistrate
30 Judge Ferenbach released Mr. Holmes on conditions, including a travel restriction that limited
31 his travel to the Northern District of Florida, where he resides, and the District of Nevada for
32 the purpose of court. ECF No. 22.

1 2. The preliminary hearing in this matter is currently set for March 15, 2020. ECF
2 No. 30.

3 3. This Court previously granted Mr. Holmes' request to visit his mother for
4 Christmas. ECF No. 26. Mr. Holmes traveled and returned without incident.

5 4. Mr. Holmes is requesting the Court permission to travel again to the Southern
6 District of Florida to visit his mother in the hospital. Specifically, he is asking the Court to issue
7 an order pursuant to 18 U.S.C. § 3142(c)(3), modifying the conditions of his pretrial release to
8 allow him to travel permission to travel to visit his mother, Lakisha Williams, in Fort
9 Lauderdale from February 20, 2021, through February 28, 2021. Mr. Holmes will travel by car
10 and will stay at his mother's residence during his visit. Ms. Williams's address will be provided
11 to Pretrial Services prior to his trip.

12 5. Mr. Holmes's Pretrial Services Officer has no objection to his request to travel.

13 6. The government has no objection to this request for modification of Mr.
14 Holmes's conditions.

15 DATED this 19th day of February, 2021.

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17 RENE L. VALLADARES
18 Federal Public Defender

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20 NICHOLAS A. TRUTANICH
21 United States Attorney

22
23 /s/ *Kathryn C. Newman*
24 By _____
25 KATHRYN C. NEWMAN
26 Assistant Federal Public Defender

22
23 /s/ *Jim W. Fang*
24 By _____
25 JIM W. FANG
26 Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
JOSEPH HOLMES,
Defendant.

Case No. 2:20-mj-00902-DJA

ORDER

JOSEPH HOLMES,
Defendant.

IT IS THEREFORE ORDERED that, pursuant to 18 U.S.C. § 3142(c)(3), Mr. Holmes is permitted to travel from the Northern District of Florida to the Southern District of Florida from February 20, 2021, through February 28, 2021, for the purpose of visiting his mother. Stipulation to Modify Conditions of Pretrial Release is granted.

DATED this 19th day of February, 2021.

UNITED STATES MAGISTRATE JUDGE